

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: BAY STATE GAS COMPANY  
STAFFING AND OTHER MATTERS**

**DTE 06-31**

**SECOND SET OF INFORMATION REQUESTS OF INTERVENOR UNITED STEEL,  
PAPER AND FORESTRY, RUBBER, MANUFACTURING, ENERGY, ALLIED  
INDUSTRIAL AND SERVICE WORKERS INTERNATIONAL UNION ("USW"),  
AFL-CIO<sup>1</sup>**

- USW 2-1: From June 1, 2005 to date, identify each BSG department that has employed/contracted temporary employees to perform work that was performed by BSG employees prior to that time. For each department identified, specify the number of temporary employees hired, the date(s) of hire, the functions the temporary employees were hired to perform, and the number of former BSG employees that the temporary employees were hired to replace.
- USW 2-2: From June 1, 2005 to date, identify each BSG department that has employed part-time employees to perform work that was generally performed by full-time BSG employees prior to that time. For each department identified, specify the number of part-time employees hired, the date(s) of hire, and the number of full-time BSG employees that the part-time employees were hired to replace.
- USW 2-3: Provide a chart comparing the number of full-time and part-time employees in

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<sup>1</sup> In this request, the term "document" or "documents" means the originals and all non-identical copies (whether different from originals by reason of notations made on such copies or otherwise), or in lieu thereof, true and exact copies, regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched or graphic matter of any kind, type or nature whatsoever, however produced or reproduced, including but not limited to contracts, proposals, statements and invoices, financial books and records, letters or other correspondence, e-mails, telegrams, telex messages, memoranda and notes of telephone conversations, telephone logs, memoranda and notes of meetings and interviews, inter-office communications, instructions, notes, memoranda, reports, summaries, manuals, magnetic tapes, tabulations, records, work papers, research papers, books, journals, microfiche, microfilm, photographic film, surveys, charts, studies, data sheets, desk calendars and diaries, policies, printed matter, telephone logs, work sheets and working papers and all documentary materials of any nature whatsoever.

The term "identify" means, with respect to a natural person, (1) his or her name; (2) his or her current job title, if still employed by the Company, and whether he or she is employed directly by Bay State Gas or NiSource; (4) his or her current business address and telephone number; and, (5) the name and address of his or her current employer, if not currently employed by the Company.

The term "identify" means, with respect to documents, (1) the author thereof and the person or persons to whom the document(s) was originally directed; (2) the source from whom Complainant obtained such document(s); (3) the date of each such document(s); (4) the current custodian of each such document(s); (5) the location at which each such document(s) is situated; and, (6) the subject matter of each such document(s).

each of BSG's departments as of June 30, 2005 and August 1, 2006.

USW 2-4: From June 1, 2005 to date, provide the number of BSG full-time employees who have left their respective positions for any reason. Additionally, for the same time period, provide the number of employees BSG has hired as permanent, full-time employees.

USW 2-5: From June 1, 2005 to date, identify any and all contractors BSG has utilized for consumer or business collections, and describe the collections functions these contractors provide/have provided. Additionally, identify each BSG department/location that performed these collections functions prior to June 1, 2005. Finally, discuss whether the contractors identified in response to the above questions will continue to provide these services if the June 2005 IBM-NCSC services agreement is implemented with regard to BSG, and, if not, whether IBM or one of its second-tier contractors would provide these services if the contract were implemented.

Respectfully submitted,

UNITED STEEL, PAPER AND FORESTRY,  
RUBBER, MANUFACTURING, ENERGY,  
ALLIED INDUSTRIAL AND SERVICE  
WORKERS INTERNATIONAL UNION, AFL-  
CIO

By its attorneys,

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